



Robert C. Gottlieb & Associates PLLC
Trinity Building
111 Broadway, Suite 701
New York, NY 10006
Tel: (212) 566-7766 · Fax: (212) 374-1506
www.robertcgottliebllaw.com
New York · Rome

January 24, 2022

VIA ECF

The Honorable Judge Rachel Kovner
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *USA v. James Davneiro, et al., 21-cr-00508 (RPK) (E.D.N.Y.)*

Dear Judge Kovner:

This law firm represents James Davneiro, a defendant in the above criminal matter scheduled for conference before Your Honor on January 31, 2022. On January 12, 2022, my firm began a trial before the Honorable George B. Daniels in the Southern District of New York, *USA v. Laurence Doud III, 19-cr-285 (GBD)*. The trial is expected to continue into February. Therefore, we write to respectfully request an adjournment of the upcoming conference to a date the week of March 7, 2022, or any date thereafter that is convenient for the Court.

We have conferred with counsel for co-defendants, Michael Perri and Giancarlo Osma, as well as the Government. All parties consent to an adjournment with an Order of Excludable Delay.

Thank you very much for the Court's time and consideration. I remain available should Your Honor require additional information.

Respectfully submitted,

ROBERT C. GOTTLIEB
& ASSOCIATES PLLC


Robert C. Gottlieb

cc: ALL COUNSEL (VIA ECF)